

**SMALL QUANTITY GENERATOR INSPECTION FORM
HAZARDOUS WASTE MANAGEMENT PROGRAM
WISCONSIN DEPARTMENT OF NATURAL RESOURCES**

I. GENERAL INFORMATION

DEPARTMENT INFORMATION

DNR District: _____ **Inspection date:** _____

DNR Inspector(s) _____

GENERATOR INFORMATION EPA ID: _____ FID: _____

Corporate/Generator Name: _____

Generator Location:

Street: _____

City: _____ **County:** _____ **Zip:** _____

Site Personnel Present: _____ **Title:** _____

Generator Mailing Address:

Street: _____

City: _____ **State:** _____ **Zip:** _____

Phone: _____

Operator: _____ **Title:** _____

Phone: _____

Legal Owner: _____ **Title:** _____

Street: _____

City: _____ **State:** _____ **Zip:** _____

Phone: _____

Company Product/Main Process: _____

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II. SUMMARY TABLE

<u>Waste Type</u>	<u>Generation Rate/Month</u>	<u>Hazardous LDR Waste Code</u>	<u>Status+</u>	<u>Standards Yes/No</u>	<u>Exceeds Treatment</u>	<u>Waste Handling*</u>
1) _____						
2) _____						
3) _____						
4) _____						
5) _____						
6) _____						
7) _____						
8) _____						

Attach waste profile, analysis, MSDS's, or other information to indicate how the facility has complied with NR 615.06, Hazardous Waste Determination, for each waste stream.

+LDR Status - use the following codes:

- | | |
|--|---------------------------|
| 1. F001-F005 Solvents (NR 675.11) | 4. First 3rd (NR 675.14) |
| 2. F020-F023, F026-F028, Dioxins (NR 675.12) | 5. Second 3rd (NR 675.15) |
| 3. California list (NR 675.13) | 6. Third 3rd (NR 675.16) |

*Waste handling - Indicate if the waste is handled on-site or provide name of off-site facility.

III. NOTIFICATION: NR 610.08(1)(b)

A.	Has the generator submitted a notification form to the Department and obtained an identification number?	Yes	No	
B.	1. Has the generator changed its ownership or added new hazardous waste activities?	Yes	No	
	2. Has a subsequent notification form been completed?	Yes	No	NA
C.	1. Has the generator changed its corporate name (no change in ownership, mailing address and/or waste codes)?	Yes	No	
	2. Has a letter to DNR and EPA or a subsequent notification form been completed?	Yes	No	NA

Comments: _____

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IV. WASTE STREAM INFORMATION

A. **Waste Determination: NR 605.12, NR 610.05, NR 675**

- | | | | |
|----|---|-----|----|
| 1. | Have all wastes been correctly identified, and if necessary, tested to obtain enough information to treat, store or dispose of the waste properly? NR 610.05, and NR 675.07 | Yes | No |
|----|---|-----|----|

Note: The inspector should determine if the generator has made a hazardous waste determination on all solid waste generated, including compliance with the TCLP requirements of NR 605.08(5) and NR 675.07.

Comments: _____

- | | | | | |
|----|---|-----|----|----|
| 2. | Are records of test results, waste analyses, or other determinations retained on site for at least 3 years from the date waste last sent to a TSD facility? | Yes | No | |
| 3. | Have waste samples been analyzed by a laboratory certified or registered under Chapter NR 149, Wis. Adm. Code for all analyses performed? NR 605.12(1) | Yes | No | |
| 4. | Have both the listed and characteristic waste code been assigned where a listed waste exhibits a characteristic? NR 675.09 | Yes | No | NA |
| 5. | If any process has changed that affected solid waste characteristics, has the generator made a new hazardous waste determination? NR 610.05(5) | Yes | No | NA |

Comments: _____

B. Treatability Group/Treatment Standard Identification

- | | | | | |
|----|--|-----|----|----|
| 1. | F001-F005 Spent Solvent Wastes; F020-F023 and F026-F028 Dioxin Wastes; First, Second, and Third 3rd Wastes: | | | |
| a. | Does the generator correctly determine the appropriate treatability group/treatment standard for each waste? | Yes | No | NA |

If available, list each waste code and check correct treatability group.

<u>Waste Code</u>	<u>Subcategory</u>	<u>Wastewater*</u>	<u>Nonwastewater</u>
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

Subcategory-see NR 675.21, Table Constituent Concentrations in Waste Extract, or NR 675.22, Tables 2 and 3 Technology-Based Standards

**Wastewater-less than 1% TOC by weight and less than 1% total suspended solids (TSS) by weight. NR 600.03(237m)*

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- | | | | | |
|----|--|-----|----|----|
| b. | Do the assigned treatment standards for listed wastes cover constituents that may cause the waste to exhibit any characteristics? NR 675.09(2) | Yes | No | NA |
| c. | Does the generator specify alternative treatment standards for lab packs? | Yes | No | NA |

If yes, do lab packs only contain the following wastes? NR 675.22(4)(b)

_ Organometallics: NR 675 Appendix III

_ Organics: NR 675 Appendix IV

2. California List Wastes: Has the generator correctly identified the treatability group and treatment standard/prohibition level for the following wastes?
NR 675.22(1)(a) and (b)

a. Liquid hazardous wastes containing PCBs - ≥ 50 ppm Yes No NA

If yes, check the appropriate treatability group:

___ 50 to 500 ppm PCBs ___ ≥ 500 ppm PCBs

b. Listed or characteristic wastes containing $\geq 1,000$ mg/l (liquids) or mg/kg (non-liquids) HOCs, which are not listed or characterized by the HOC content. Yes No NA

If yes, check the appropriate treatability group:

___ Dilute HOC wastewater (1,000 mg/l to 10,000 mg/l HOCs)
___ All other HOC's greater than or equal to the prohibition level of 1,000 mg/l (liquids or mg/kg (non-liquids))

3. Treatment standards expressed as required technologies:

Has the generator specified an alternative method to that required in NR 675.22? Yes No NA

If yes, list the waste code, the technology specified in NR 675.22, the alternative method, and documentation of approval. NR 675.22(2)

<u>Waste Code</u>	<u>Required Technology</u>	<u>Alternative Method</u>	<u>Approval</u>
___	___	___	___
___	___	___	___
___	___	___	___

4. Does the generator mix restricted wastes with different treatment standards for a constituent of concern? Yes No NA

If yes, did the generator select the most stringent treatment standards? (NR 675.21(2) and NR 675.23(2)) Yes No NA

8/96 Comments: _____

C. Waste Analysis

1. Does the generator determine whether restricted wastes exceed treatment standards/prohibition levels at the point of generation? NR 675.07(1) Yes No
2. If the answer to question 1 is no, does the generator ship all restricted wastes as not meeting treatment standards? If yes, go to question 4. Yes No NA

3. Which of the following analytical methods does the generator employ? NR 675.07

a.	Knowledge of waste:	Yes	No	NA
<hr/>				
b.	TCLP: Are wastes with treatment standards specified in NR 675.21 and NR 675.07(2)(a) analyzed using TCLP? BDAT = stabilization/immobilization technology.	Yes	No	NA
<hr/>				
c.	Total constituent analysis: Are wastes with treatment standards specified in NR 675.23 and NR 675.07(2)(c) analyzed using total constituent analysis? (BDAT = destruction/removal technology)	Yes	No	NA
<hr/>				
d.	PFLT*: Was PFLT used to determine if California List constituents were contained in liquid hazardous waste? NR 675.13(4)	Yes	No	NA
*PFLT = Paint filter liquids Test [Test Method 9095, EPA Publication No. SW-846]				

4. Dilution Prohibition NR 675.06:

- | | | |
|--------------------------------|---|----------|
| a. | Does the generator dilute restricted wastes to meet the treatment standard criteria, or render them nonhazardous? | Yes No |
| <i>If no, go to Section V.</i> | | |
| b. | Are the wastes treated in a treatment system subsequently discharged to a water of the state pursuant to a WPDES permit or for the purposes of pretreatment requirements of Chapter 147, Stats? | Yes No |
| c. | Are the wastes hazardous solely because they exhibit a characteristic and not D003 reactive cyanide wastewaters or nonwastewaters? | Yes No |
| d. | Is there no treatment method specified in NR 675.22 for this waste? (If there is a treatment standard specified, dilution is prohibited) | Yes No |

Note: If the answer to any of the questions b-d above, the generator is performing prohibited dilution.

Comments: _____

V. ON-SITE MANAGEMENT

Note: If the generator treats hazardous waste, answer the following questions, if not, go to Section VI.

- | | | |
|----|---|---------------|
| A. | If the generator treats characteristic wastes in systems regulated under Chapter 147, Wis. Stats., has the generator documented the determination of restriction and how the restricted wastes are managed prior to discharge pursuant to the WPDES permit? | Yes No NA |
| B. | If the generator treats characteristic wastes in RCRA exempt units to render them nonhazardous, are the wastes managed as restricted until NR 675 treatment standards are met?* | Yes No NA |

**This applies to both concentration based treatment standards specified in NR 675.21 and NR 675.23, and to some NR 675.22 required methods which result in treatment below the characteristic level.*

Comments: _____

C. Treatment Using NR 630 Exempt Units or Processes

- | | | |
|----|---|----------|
| 1. | Are restricted wastes treated in NR 630 exempt units (i.e., boilers, furnaces, distillation | Yes No |
|----|---|----------|

units, wastewater treatment tanks, elementary neutralization, etc.)?

If no, go to section VI.

<u>Waste Type</u>	<u>Waste Code</u>	<u>Type of Treatment</u>	<u>Treatment Units and Process</u>
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

- | | | |
|----|--|-----------------|
| 2. | Are treatment residuals generated from these units? | Yes No NA |
| 3. | Are residuals further treated, stored for greater than 180 days (or 270 days if it can be documented that the waste must be shipped greater than 200 miles), or disposed on site?
NR 610.08(5)(c) | Yes No NA |

If yes, the generator is also is a storage facility.

Comments: _____

D. OTHER TREATMENT

- | | | |
|----|--|-----------------|
| 1. | Does the generator great hazardous waste in any methods other than described above? | Yes No |
| 2. | If the answer to question 1 above is yes, does the generator comply with all regulations that apply to this method of treatment? | Yes No NA |

Comments: _____

VI. OFF-SITE MANAGEMENT AND MANIFEST REQUIREMENTS

A. Manifest Requirements: NR 610.08(1)(d), 615.08

- | | | |
|----|---|-----------|
| 1. | Does the generator initiate a uniform manifest form with all off-site shipments of hazardous waste? NR 615.08(1) | Yes No |
| 2. | Are copies of all manifests for the past 3 years retained by the generator and available for review? NR 615.08(7) | Yes No |
| 3. | Does the manifest specify a designated facility which is permitted, licensed, or exempt from permitting or licensing and approved to take the waste? NR 615.08(3) | Yes No |
| 4. | Are procedures for exception reporting followed properly, if an exception has occurred? NR 615.11(2) | Yes No |
| 5. | Does the generator properly route manifest copies to the Department and the consignment state (if waste was shipped out of state)? NR 615.08(6), (9) & (10) | Yes No |
| 6. | Are the manifests properly completed? NR 615.08(8)(a)-(1) | Yes No |

B. Waste Minimization Certification: NR 610.08(1)(e)

- | | | | |
|----|---|-----|----|
| 1. | Has the small quantity generator made a good faith effort to minimize their waste generation? | Yes | No |
|----|---|-----|----|

Inspector: Discuss with facility personnel any attempts they have made or intend to make concerning waste minimization. Make appropriate suggestions for their consideration and provide them with Department literature and information sources.

C. Pre-transport Requirements: NR 610.08(1)(j-l)

- | | | | | |
|----|---|-----|-----|----|
| 1. | If verifiable, is waste packaged marked and labeled in accordance with DOT regulations concerning hazardous materials? NR 610.08(1)(j-k) | Yes | No | NA |
| 2. | Does the generator offer the initial transporter of the hazardous waste the appropriate placards required by DOT regulations? NR 610.08(1)(l) | | Yes | No |

Comments: _____

D. Off-Site Management: Waste Exceeds Treatment Standards (NR 610.08(1)(x))

- | | | | | |
|----|---|-----|----|----|
| 1. | Does the generator ship any waste that exceeds treatment standards/prohibition levels to an off-site treatment or storage facility? | Yes | No | |
| | <i>If no, go to C.</i> | | | |
| 2. | Does the generator provide a notification to the treatment or storage facility with each waste shipment? NR 675.07(1)(c) | Yes | No | |
| 3. | If the generator specifies alternative treatment standards for lab packs, is the certification required in NR 675.07(1)(k) or (l) included with the notification for each shipment? | Yes | No | NA |

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C. Off-Site Management: Waste Meets Treatment Standards (NR 610.08(1)(x))

- | | | | | |
|----|--|-----|----|----|
| 1. | Does the generator ship waste that meets treatment standards/prohibition levels to an off-site disposal facility? | Yes | No | |
| | <i>If no, go to D.</i> | | | |
| 2. | Does the generator provide a notification and a certification to the disposal facility with each waste shipment? NR 675.07(1)(d) | Yes | No | NA |
| 3. | Are characteristic wastes which have been rendered nonhazardous (in a RCRA exempt unit) shipped to a Subtitle D facility? | Yes | No | NA |

Comments: _____

D. Records Retention:

- | | | | | |
|----|--|-----|----|----|
| 1. | Does the generator retain on site copies of all LDR notifications, certification, and other relevant documents for a period of 5 years? NR 675.07(1)(i) | Yes | No | |
| 2. | Do LDR documents reflect proper management of wastes previously covered under expired national capacity variances, case-by-case extensions and the soft hammer provisions? | Yes | No | NA |

Note: See summary table on page 2, (treatment standards column).

VII. ANNUAL REPORTING NR 610.08(1)(g)

- | | | | |
|----|--|-----|----|
| A. | Have annual reports covering generator activities during the previous calendar years been submitted? | Yes | No |
|----|--|-----|----|

Comments: _____

VIII. EMERGENCY PROCEDURES NR 610.08(1)(w)

- | | | | |
|----|---|-----|----|
| A. | Is an emergency coordinator identified who will be at all times present or respond to an emergency by reaching the facility in a short period of time? NR 610.08(1)(w)1 | Yes | No |
|----|---|-----|----|

- | | |
|----|---|
| B. | Has the generator posted the following information to any telephone that may be used by the emergency coordinator when responding to an emergency? NR 610.08(1)(w)2 |
|----|---|

- | | | | |
|----|---|-----|----|
| 1. | Name and phone number of the emergency coordinator?
NR 610.08(1)(w)2.a | Yes | No |
|----|---|-----|----|

- | | | | | |
|------|----|---|-----|----|
| 8/96 | 2. | The location of fire extinguisher, spill control equipment and if present, fire alarm? NR 610.08(1)(w)2.b | Yes | No |
|------|----|---|-----|----|

- | | | | |
|----|---|-----|----|
| 3. | Phone number of the fire department (unless the facility has a direct alarm). NR 610.08-(1)(w)2.c | Yes | No |
|----|---|-----|----|

- | | |
|----|---|
| C. | Does the emergency coordinator take the following actions in an emergency: NR 610.08(1)(w)3 |
|----|---|

- | | | | |
|----|---|-----|----|
| 1. | Activate internal alarms or communications systems to notify all personnel of immediate or actual emergency situations? | Yes | No |
|----|---|-----|----|

- | | | | |
|----|---|-----|----|
| 2. | In the event of a fire, call the fire department and if appropriate try to extinguish the fire? | Yes | No |
|----|---|-----|----|

- | | | | |
|----|---|-----|----|
| 3. | In the event of a discharge or a spill, contain the flow of hazardous waste to the extent possible? | Yes | No |
|----|---|-----|----|

- | | | | |
|----|---|-----|----|
| 4. | Telephone the Division of Emergency Government (at 1-800-943-0003) and comply with the requirements of s. 144.76, stats., and ch. NR 706? | Yes | No |
|----|---|-----|----|

- | | | | |
|----|--|-----|----|
| 5. | Take all reasonable measures to ensure that fires, explosions and discharges do not occur, reoccur or spread to other parts of the facility? | Yes | No |
|----|--|-----|----|

- | | | | |
|----|---|-----|----|
| 6. | Arrange for the clean-up of hazardous waste and any contaminated materials or soil? | Yes | No |
|----|---|-----|----|

IX. Personnel Training/Records: NR 610.08(1)(u), NR 610.08(1)(v)

A.	Are all employees properly trained and thoroughly familiar with proper waste handling and emergency procedures, relevant to their responsibilities during normal facility operations and emergencies? NR 610.08(1)(u)	Yes	No	
B.	If the generator accumulates more than 1,000 kilograms of hazardous waste, but less than 6,000 kg at any time, are the following records kept at the facility? NR 610.08(1)(v)			
1.	A written description of the training program?	Yes	No	NA
2.	Documentation that employees have received training, and that the training has been reviewed annually?	Yes	No	NA
X.	Preparedness and Prevention: NR 610.08(1)(q) and NR 630.21			
A.	Does the generator have the following equipment, as applicable for the type of waste managed? NR 630.21(2)			
1.	Internal communication systems?	Yes	No	
2.	A device to summon emergency assistance, such as a telephone or a 2-way radio?	Yes	No	NA
3.	Portable fire extinguishes?	Yes	No	
4.	Fire control equipment, including special extinguishing equipment and extinguishing agents?	Yes	No	NA
5.	Spill control equipment?	Yes	No	
6.	Decontamination equipment?	Yes	No	
B.	Is all emergency equipment immediately accessible to persons handling the wastes? NR 630.21(3)	Yes	No	
C.	Is all of the equipment mentioned in #1 tested and maintained as required to assure its proper operation in an emergency? NR 630.21(4)	Yes	No	
D.	Is adequate aisle space provided throughout the hazardous waste site to allow unobstructed movement of personnel and all emergency equipment mentioned in #1 above? NR 630.21(5)	Yes	No	
E.	Has the generator made service arrangements with the following groups appropriate for the type of waste handled at the facility and their potential need for the services? NR 630.21(6)			
1.	Familiarized police, fire dept. and emergency response team with facility layout, properties of hazardous waste handled, and associated hazards. NR 630.21(6)(a)		Yes	No
2.	Where more than one police and fire dept. may respond to an emergency, designated primary emergency authority. NR 630.21(6)(b)		Yes	No
3.	Made agreements with state emergency response teams, emergency response contractors and equipment suppliers. NR 630.21(6)(c)		Yes	No
4.	Familiarized local hospital with properties of		Yes	No

hazardous waste handled at the facility and the types of illness or injury that could result from exposure. NR 630.21(6)(d)

Comments: _____

XI. Other Requirements

A.	Does the generator have spill containment tanks? NR 610.08(3)	Yes	No
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If the answer is yes, then complete the appropriate attachment.

B.	Does the generator combine absorbent material with waste generated on site? NR 610.08(4)	Yes	No
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If the answer is yes, complete the appropriate attachment.

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XII. 180-Day Container Accumulation: NR 610.08(1)(n) and (o)

NOTE: Containers and tanks are the only means allowed to store large quantities of hazardous waste and be eligible for the 180-day exemption. Any other means of storage, such as waste piles, require an interim or operating storage license/variance. (See the definitions of container, tank and pile in NR 600.03). If waste is stored in tanks, complete attachment for tanks.

A.	Does this generator accumulate hazardous waste in containers?	Yes	No
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*If no, skip this section.
If yes, continue below.*

B.	Are the containers marked with the date on which hazardous waste was first placed in the container for accumulation? NR 610.08(1)(o)9.	Yes	No
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Note Section XIII: Under NR 610.08(2)(b) a generator storing waste in satellite accumulation areas is exempt from the accumulation time limits.

C.	Are containers marked with the words "Hazardous Waste" before placing them in an accumulation area or on-site storage area? NR 610.08(1)(k)1.	Yes	No
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D.	Is the hazardous waste removed from the site before the end of the 180-day (or 270 day if it can be documented that the waste must be shipped 200 miles or more) accumulation period or treated, stored or disposed of in an approved on-site hazardous waste facility or on-site recycling facility? NR 610.08(1)(n)	Yes	No
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E.	Are all the containers which are used to store or treat hazardous waste in good condition? 610.08(1)(o)3.	Yes	No
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F.	Are containers made of or lined with materials which are compatible with the wastes in them? NR 610.08(1)(o)8.	Yes	No
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G.	Are containers stored closed, except when it is necessary to add or remove waste? NR 610.08(1)(o)5.	Yes	No
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H.	Are containers opened, handled and stored in such as way as to prevent leaks or ruptures? 610.08(1)(o)6.	Yes	No
I.	Are containers inspected weekly for leaks and defects? NR 610.08(1)(o)1.	Yes	No
J.	Are the weekly inspections recorded into an inspection log or summary, which includes the date and the time of inspection, the name of the inspector, a notation of the observations made, and the date and nature of any repairs or other remedial actions? NR 610.08(1)(o)2.	Yes	No
K.	Are records kept for at least 3 years from date of inspection? NR 610.08(1)(o)2.	Yes	No
L.	Are incompatible wastes stored in separate containers? NR 610.08(1)(o)11.	Yes	No NA
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M.	Are containers of incompatible waste separated or protected from each other by physical barriers such as a berm, dike, wall or other device? NR 610.08(1)(o)7.	Yes	No NA
N.	Are empty containers washed prior to adding incompatible waste? NR 610.08(1)(o)10.	Yes	No NA

Comments: _____

XIII. Satellite Accumulation NR 610.08(2)

A.	Does the generator accumulate waste at or near the generation point?	Yes	No
	<i>If <u>no</u>, skip this section.</i> <i>If <u>yes</u>, continue below.</i>		
1.	Is the container in good condition? NR 610.08(2)(a)2.	Yes	No
2.	Is the container always closed except when it is necessary to add or remove waste? NR 610.08(2)(a)4.	Yes	No
3.	Is the container lined or compatible with the waste being accumulated? NR 610.08(2)(a)6.	Yes	No
4.	Is the container marked with words "Hazardous Waste" and other words that identify the contents of the container? NR 610.08(2)(a)7.	Yes	No
5.	Have 55 gallons or more of hazardous waste accumulated at or near the generation point? NR 610.08(2)(a)8.	Yes	No NA
6.	Has one quart or more of acutely hazardous waste listed in section NR 605.09(2)(a), Table II, or (3)(b), Table IV, accumulated at or near the generation point? NR 610.08(2)(a)8.	Yes	No NA

If the answer to 5 is yes, then the facility must comply with applicable generator requirements of NR 610.08(1) for this waste (180-day accumulation) If the answer to 6 is yes, the facility is a large quantity generator.

XV. STATUS EVALUATION

A. Classification Based on Region Verification: _____

Note: If the inspection-verified classification is different from the current notification status, a status change form (Form 4430-12) should be completed and attached.

Signature: _____ Date: _____

This generator is also subject to regulation as a:

___ Treatment Facility (specify container, tank, other) _____

___ Exempt Treatment Facility (specify) _____

___ Transfer Facility

___ Storage Facility (specify, container, tank) _____

___ Exempt Storage Facility (specify) _____

___ Disposal Facility

___ Transporter